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April 22, 2020

**VIA ECF**

Honorable Sarah Netburn  
U.S. Magistrate Judge  
Thurgood Marshall Courthouse  
40 Foley Square  
Room 430  
New York, NY 10007

**Re: Phillies v. Harrison/Erickson, Inc. et al., No. 19-cv-7239-VM-SN**

Dear Judge Netburn:

Counsel for defendants requested that plaintiff's counsel agree to extend the deadlines for completion of expert discovery, and plaintiff's counsel has agreed. Accordingly, counsel for the defendants request that the deadline for the completion of expert discovery currently set for May 28, 2020 ("Order", ECF 73) be amended to provide as follows:

- (i) Initial expert reports to be exchanged on or before May 14, 2020
- (ii) Responsive expert reports, if any, to be exchanged on or before June 4, 2020
- (iii) Expert depositions to be completed within 16 calendar days after responsive reports, if any, are served;
- (iv) If no responsive reports are served, expert depositions will be completed by May 25, 2020.

Plaintiff's counsel does not oppose this request.

We also note that Your Honor's Order states that "[i]n light of the current public health emergencies, the parties may file a letter motion to extend those [discovery] deadlines as necessary."



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Respectfully submitted,

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